

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**[PROPOSED] ORDER**

Upon consideration of Defendant’s Motion to Compel Records, the memorandum in support thereof, any opposition thereto, any reply in further support thereof, and the entire record herein, for good cause shown, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2019, hereby

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that the government shall produce to defendant (1) all information within the United States government’s possession, including the State Department and the intelligence agencies, that indicates that Recep Tayyip Erdoğan (“Erdoğan”) has ever been a member of, or otherwise affiliated with or sympathetic to, the Muslim Brotherhood, and (2) all information within the United States government’s possession, including within the State Department, that tends to show that Turkish government officials, including Erdoğan, would disagree with or disapprove of any comparison between Fethullah Gülen (“Gülen”) or his followers and the Muslim Brotherhood.

**SO ORDERED.**

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The Honorable Anthony J. Trenga  
United States District Judge